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By ECF and Email

The Honorable Richard J. Sullivan
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
sullivanysdchambers@nysd.uscourts.gov

Re: *In re Welspun Litigation*, Case No. 1:16-cv-06792-RJS-DCF
[Rel. Case No. 16-cv-08662-RJS-DCF]

Dear Judge Sullivan:

On March 10, 2017, Plaintiffs in *In re Welspun Litigation* filed a pre-motion letter regarding their intended motion to consolidate this action with a related case, *Monahan v. Wal-Mart Stores, Inc.*, No. 16-cv-08662-RJS-DCF (“*Monahan*”). (*In re Welspun Litig.* Dkt. No. 75.) Plaintiff in *Monahan* filed a response to that letter on March 15, 2017, in the *Monahan* docket only, stating that she does not oppose consolidation. (*Monahan* Dkt. No. 24). However, the *Monahan* plaintiff also asked your Honor to set a briefing schedule for her intended motion for lead counsel under F.R.C.P. 23(g) for claims against retailers, despite the fact that Bursor & Fisher P.A. has already been appointed interim lead counsel in *In re Welspun Litigation*. (Dkt. No. 58.)

The *Monahan* plaintiff raised that request for the first time in her response to the March 10, 2017, pre-motion letter, and Rule 2.A of Your Honor’s Individual Rules and Practices prohibit reply letters. Accordingly, Plaintiffs in *In re Welspun Litigation* respectfully request permission to file a brief response to the *Monahan* plaintiff’s request for briefing on her proposed Rule 23(g) motion.

Respectfully submitted,



Scott A. Bursor

CC: All counsel of record (via ECF)